



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221

JUL 8 2010



Mr. David Ploetz, Manager
 Central Characterization Project
 Washington TRU Solutions, LLC
 P.O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Evaluation of the Closure Documentation for CAR 10-026 from Audit A-10-14, Los Alamos National Laboratory Central Characterization Project Activities

Reference: WTS letter CP:10:01415 dated June 30, 2010, from Mr. D. K. Ploetz, Manager, Central Characterization Project, Washington TRU Solutions, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, Carlsbad Field Office

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Report (CAR) 10-026 closure documentation submitted in the above-referenced letter.

The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates acceptance of the submitted closure documentation. Please be advised that CBFO CAR 10-026 is considered closed.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

| | | | |
|-----------------------|------|-----------------------------------|----|
| A. Holland, CBFO | * ED | R. Joglekar, EPA | ED |
| M. Navarrete, CBFO | ED | S. Ghose, EPA | ED |
| N. Castaneda, CBFO | ED | R. Lee, EPA | ED |
| D. Gadbury, CBFO | ED | S. Zappe, NMED | ED |
| D. Haar, WTS/CCP | ED | S. Holmes, NMED | ED |
| V. Cannon, WTS/CCP | ED | T. Kesterson, DOE OB WIPP NMED | ED |
| A. J. Fisher, WTS/CCP | ED | D. Winters, DNFSB | ED |
| M. Walker, WTS/CCP | ED | P. Gilbert, LANL-CO | ED |
| Y. Salmon, WTS/CCP | ED | G. Lyshik, LANL-CO | ED |
| J. Hoff, WTS | ED | A. Pangle, CTAC | ED |
| M. Mullins, WTS | ED | G. White, CTAC | ED |
| G. Rael, LASO | ED | T. Putnam, CTAC | ED |
| L. Bishop, LASO | ED | WIPP Operating Record | ED |
| T. Peake, EPA | ED | CBFO QA File | |
| M. Eagle, EPA | ED | CBFO M&RC | |
| E. Feltcorn, EPA | ED | *ED denotes electronic distributi | |



CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 10-026

2. Activity No: A-10-14

3. Page 1 of 2

Block # 9 Condition Adverse to Quality (CAQ):

There is no objective evidence that TRUPACT-II part number 2077-180-24 (ICV seal test port plug seal O-ring) was replaced, as required, when the corresponding seal test port plug (2077-156-07) was replaced on TRUPACT-II #176 on Job #09-049. (This is not a containment boundary item.)

Block # 17 Acceptance of Corrective Action Completion:

An evaluation was performed of the completion of corrective actions related to CBFO Corrective Action Report (CAR) 10-026. The notification of completion of corrective actions was submitted via letter CP:10:01415, dated June 30, 2010, from D. K. Ploetz, Central Characterization Project Manager, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office. The letter contained the following attachments:

- (Action 1) Maintenance Records for Job #09-049, Annotated with Reference to CBFO CAR 10-026
- (Action 2) Briefing on the Procedural Requirements for Performing Maintenance to Ensure Compliance with Work Instruction CH.01, Attendance Roster for the Briefing on Procedural Requirements, and E-Mail Used as the Basis for the Briefing on Procedural Requirements
- (Action 3) CCP Standing Order CCP-SO-063, Revision Original

Remedial Actions:

The completed Maintenance Record form for Job #09-049 supports the conclusion that the O-ring was not replaced when work was performed in October 2009. There are blocks on the form in which to place the peel-off labels from the bags containing the plug and the O-ring (or to write in the information, if there are no peel-off labels). For Job #09-049, the completed Maintenance Record form has the peel-off label for the plug, but the block where the O-ring information should have been entered is marked N/A.

CCP will take the following remedial action in response to the CAR condition:

- a) CCP will add a note to complete Maintenance Record form for Job #09-049 referencing CBFO CAR 10-026, so that it is clear that the problem has been identified and addressed.

Closure documentation (Action 1) included a copy of the annotation and was reviewed to ensure closure of Remedial Actions.

Actions To Preclude Recurrence

Item a) CCP sent an e-mail to all MLU Team members, stating the procedural requirements for performing maintenance to ensure compliance with DOE/WIPP 02-3183, Rev. 6, Attachment B, Work Instruction CH.01, Revision 2 (completed 5/21/10). CCP will follow up with a briefing that addresses and reinforces the above requirements and submit a copy of the attendance roster upon closure.

- (Action 2) Briefing on the Procedural Requirements for Performing Maintenance to Ensure Compliance with Work Instruction CH.01, Attendance Roster for the Briefing on Procedural Requirements, and E-Mail used as the Basis for the Briefing on Procedural Requirements

Documentation of Action 2 was reviewed and found to be acceptable.

Item b) CCP will direct that operators take a copy of any applicable Work Instruction(s) with them when performing maintenance in the field. This direction will be documented in a CCP standing Order that will remain in effect until a permanent location is identified for the requirement. Submit a copy of the standing order upon closure.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 10-026

2. Activity No: A-10-14

3. Page 2 of 2

- (Action 3) CCP Standing Order CCP-SO-063, Revision Original

Documentation of Action 3 was reviewed and found to be acceptable.

The corrective actions for the condition adverse to quality described in the CBFO CAR 10-026 are determined to be complete and it is recommended that the CAR be closed.

James R. Schultz FOR T. PUTNAM
Completion of Corrective Actions Evaluated By: Thomas Putnam

July 6, 2010 ✓

Date